



ALABAMA HAZARDOUS WASTES MANAGEMENT AND MINIMIZATION ACT (AHWMMA)
Compliance Evaluation Inspection (CEI) Report

1) Author of Report

L. J. Knickerbocker
Environmental Scientist, Senior
Compliance and Enforcement, Industrial Hazardous Waste Branch
Alabama Department of Environmental Management (ADEM)
1400 Coliseum Boulevard
Montgomery, AL 36110

2) Facility Information

Sejong Alabama, LLC (Sejong)
450 East Old Fort Road
Fort Deposit, Lowndes County, Alabama 36032

EPA ID Number: ALR000058180
NAICS Code: 336399
Telephone: (334) 227-0821

3) Responsible Officials

Blake Miley, Environmental Health & Safety Manager - Sejong
Email: [[HYPERLINK "mailto:bmiley@sjausa.com"](mailto:bmiley@sjausa.com)]
Telephone: (706) 816-1502
Tanya Speir, Human Resources Manager – Sejong
Email: [[HYPERLINK "mailto:tspeir@sjausa.com"](mailto:tspeir@sjausa.com)]
Telephone (334) 227 – 0821 Ext. 506

4) Inspection Participants

Ms. Tanya Speir
Mr. Dale Beach, Quality Manager – Sejong
Mr. Chris Kim, Plant Manager - Sejong
Ms. Paula Whiting, Environmental Engineer
US Environmental Protection Agency - Region 4
Ms. L. J. Knickerbocker

5) Date of Inspection

March 21, 2016

6) Applicable Regulations

ADEM Administrative Code Division 335-14, Hazardous Waste Program Regulations

7) Purpose of Inspection



The purpose of the inspection was to determine the facility's compliance with all applicable requirements of Division 14 of the ADEM Administrative Code.

8) Facility Description

Sejong assembles exhaust systems as a Tier 1 supplier for Hyundai Motor Manufacturing Alabama, LLC and Kia Motors Manufacturing Georgia, Inc. The facility consists of a single assembly plant with five separate welding areas. Each welding area is equipped with its own baghouse. See Photograph #1 for an aerial view of the site.

In its most recent notification of regulated waste activity prior to the inspection (ADEM Form 8700-12, dated October 24, 2014), Sejong identified itself as a conditionally exempt small quantity generator of chromium sludge (EPA hazardous waste number D007), a small quantity handler of universal waste, and a used oil generator. Subsequent to the inspection, on March 22, 2016, Sejong identified itself as a small quantity generator of chromium waste (EPA hazardous waste number D007), a small quantity handler of universal waste, and a used oil generator.

9) Observations

On March 21, 2016, Ms. Whiting and I (hereinafter "we" or "us") arrived at the site at 1:15 p.m. and proceeded to the front lobby, where we met Ms. Speir and Mr. Beach. We introduced ourselves and explained the purpose of the inspection. We proceeded to a conference room where we held the opening meeting, and where the facility representatives provided background information about the site and an overview of its operations.

The site was established in 2004; it has operated continuously since that time. It currently operates from 16 to 24 hours per day, Monday through Friday; it runs two 8- or 10-hour shifts, depending on the demand from the vehicle assembly plants. It has 160 employees; eight of these employees handle hazardous waste on a routine basis.

The largest waste streams handled at the site are chromium-containing baghouse dust and spent baghouse filters; the dust is generated when stainless steel exhaust components are welded together. Additional waste streams include universal waste lamps and batteries, used oil, and paint-related waste (spent paint pens, waste paint and solvent, and residues drained from spent aerosol paint cans that carry EPA hazardous waste numbers D001, D035, F003, and F005).

During the past three years, hazardous wastes have been sent to EWS Alabama Inc. (ALD981020894) in Glencoe, Alabama; Tradebe Treatment & Recycling of Tennessee, LLC (TND000772186) in Millington, Tennessee; and Safety-Kleen Systems, Inc. (KYD053348108) in Smithfield, Kentucky. Used oil is collected by Smith Waste Oil (ALR000043356), which is headquartered in Sylacauga, Alabama. Universal waste is sent to Environmental & Recycling Solutions, Inc. (ALR000044990), which is headquartered in Opelika, Alabama.

Following the opening meeting, Ms. Speir, and Mr. Beach accompanied us on a tour of the site, during which we conducted the walk-through inspection. Mr. Kim joined us about halfway through the site tour.

During the walk-through inspection, we noted the following:

Breezeway (Universal Waste Storage Area)

The Breezeway (an enclosed passage that marks the separation point between the administrative offices and the production floor) is where accumulated universal waste lamps and batteries, spent paint pens, and electronic devices are stored pending removal from the site. In this area, we observed the following items:



- Four corrugated cardboard boxes holding spent universal waste (UW) fluorescent lamps
- One corrugated cardboard box holding broken fluorescent lamps that was closed, labeled with the words “Hazardous Waste”, and dated (September 1, 2015)
- One uncontained high-intensity discharge lamp (HID lamp)
- One unmarked 55-gallon drum holding three spent paint pens
- Two 5-gallon plastic buckets holding UW batteries (one each of Ni-Cad and Lithium ion)
- One open cardboard box holding four UW lead-acid emergency lighting batteries
- Seventeen spent fluorescent lamp ballasts, and
- Two unwanted microwave ovens.

The following noncompliant issues were noted in this area:

- The four boxes containing UW lamps were not marked or closed (the flaps were not closed or sealed).
- The uncontained HID lamp was placed on top of the box containing the broken lamps. It appeared to be intact but was not marked in any way. Representatives of Sejong were not sure if this lamp was a waste (it was subsequently managed as UW).
- The drum that contained the spent paint pens was closed but was not marked with the words “Hazardous Waste” with other words describing the content. The pens contained xylene and are disposed as an ignitable (D001) hazardous waste.
- The containers holding the UW Ni-Cad and Lithium ion batteries were both closed and properly marked but were not dated.
- The UW lead-acid batteries were intact but were not marked or dated.

(In an email dated March 23, 2016, Mr. Blake Miley responded to the *Preliminary Inspection Report* form that was issued at the time of the inspection, declaring all UW items had been properly contained, labeled, and dated and the marking on the drum holding the paint pens had been corrected.)

The facility representatives were not able to demonstrate the length of time that universal wastes had been accumulated on site. As a further matter, they were unable to describe how they intended to manage the spent lamp ballasts or the microwave ovens. See Photograph #2 through Photograph #5.

Used Oil Storage Area

Used oil is generated from various equipment maintenance activities conducted throughout the site. The oil is collected and brought to the Used Oil Storage Area, which consists of two 250-gallon totes staged over a secondary containment unit at the northeast corner of the facility. Both totes were in good condition, closed, and clearly marked with the words “Used Oil”. No issues were noted in this area. See Photograph #6 and Photograph #7.

Baghouse (Satellite Accumulation Areas)

Sejong has five baghouses that collect chromium-contaminated dust generated during the welding of exhaust systems. Each baghouse serves a specific production line.

The “LFA” unit, which services the Sonata line, is located near the northeast corner of the building. Two 55-gallon drums were attached to the unit via flexible hoses permanently affixed to covers that were attached to the drums with locking rings. By attempting to shift the drums, we ascertained that one was full, while the other was about half-filled. Both were closed and marked with the words “Hazardous Waste”; however, neither container was dated. The cover on the full drum appeared to be rusted. See Photograph #8.

The “UD” unit, which had serviced the Elantra line, is located near the mid-point of the east wall of the plant. This unit was shut down on December 14, 2015. Two full 55-gallon drums were still attached to



the unit; both were closed and marked with the words “Hazardous Waste”, but neither container was marked with an accumulation start date. One drum appeared to be significantly rusted. The “return air” duct was vented to the outside; per Mr. Kim and Ms. Speir, the air returned from the filtration unit was either too hot or too cold, making it difficult to control the air temperature inside the plant. See Photographs #9 – #11.

The “WCC1” unit is located along the east wall of the plant between the “UD” unit and the “WCC2” unit. It services the engine line, rather than a specific vehicle. There were two 55-gallon drums at this baghouse; one was about 75% full, while the other was about 25% full. Both were marked with the words “Hazardous Waste” and were closed, but the lids appeared to be significantly rusted. Neither container was marked with an accumulation start date. Again, the “return air” duct was vented to the outside to make it easier to control the air temperature in the vicinity of the unit. See Photographs #12 and #13.

The “WCC2” unit is located near the south east corner of the building. It also services the engine line. Two full 55-gallon drums were attached to the unit. Both were in good condition, marked with the words “Hazardous Waste”, and were closed. They were not marked with an accumulation start date. See Photograph #14

The “Rework” baghouse is located near the center of the north wall of the plant and serves the Rework Area, where faulty welds are redone. Two partially-filled 55-gallon drums were attached to this baghouse. Both were closed and in good condition. One was marked with the words “Hazardous Waste”, while the other was neither marked nor labeled. See Photograph #15

(In an email dated March 23, 2016, Mr. Blake Miley responded to the *Preliminary Inspection Report* form and declared: all full containers were moved to the hazardous waste storage area; the rusted containers and lids had been replaced; lids that shed water had been ordered; and all drums had been correctly labeled.)

Maintenance Area, Mechanical Room/Chemical Storage Area (Used Oil Generation and Storage, Satellite Accumulation Area, Universal Waste Storage)

In the Maintenance Area, located near the Breezeway, facility employees maintain and repair site equipment. Used oil-saturated sorbents, paint related waste, and spent aerosol paint cans are generated during maintenance and repair activities in this area. There was one parts washer unit in the Maintenance Area; per Mr. Beach, it is maintained by Safety-Kleen. In addition, there was a corrugated cardboard box of UW lamps stored in the Maintenance Area. The box was neither closed, marked or labeled with any of the required phrases, nor dated. As with other UW items, facility personnel were unable to demonstrate the length of time that these UW lamps had been accumulated on site. (In an email dated March 23, 2016, Mr. Blake Miley provided documentation showing that the box of UW lamps had been closed, marked, and dated.)

In the Mechanical Room/Chemical Storage Area located adjacent to the Maintenance Area, facility personnel puncture aerosol cans, collect empty paint cans, and store oil-saturated sorbents. The following units were staged in this area:

- One 55-gallon drum equipped with an aerosol can puncture device;
- One open hopper holding empty paint cans and punctured aerosol cans; and
- One 55-gallon drum of oil-saturated spent sorbents.

The drum equipped with the aerosol puncture unit was closed, labeled with the words “Hazardous Waste”, and appeared to be in good condition. A sign upon which were written the words “Aerosol



Universal Waste” was posted above the hopper holding the empty paint cans and aerosol cans. The drum holding the oil-saturated material was closed and in good condition but was not marked with the words “Used Oil”. Instead, it was labeled with the words “Oily Hazardous Waste”. See Photograph #16 through Photograph #20.

Records Review

Because our observations indicated that Sejong was, at least, an episodic generator of hazardous waste at or above the small quantity generator level, we asked the facility representatives to provide any available documents related to hazardous waste generation and management, emergency preparedness and response, and employee training. Sejong was able to provide hazardous waste determinations for all wastes generated at the site and three manifests for shipments of hazardous waste. The paint and solvent waste carried EPA hazardous waste numbers D001, D035, F003, and F005. The chromium-containing baghouse dust and filters carried EPA hazardous waste number D007. Additional uniform hazardous waste manifests, nonhazardous waste manifests, and bills of lading were provided via email on March 29, 2016.

Facility representatives could not provide documentation of the quantity of hazardous waste generated each month. However, a review of hazardous waste manifests provided subsequent to the inspection revealed the following:

1. Since July of 2014, Sejong has shipped more than 2,200 pounds of hazardous waste off-site on two occasions.
 - a. On July 2, 2014, 680 pounds of hazardous waste (paint related materials) was shipped off-site.
 - b. On August 21, 2014, 2,350 pounds of chromium-containing dust was shipped off-site.
2. On May 22, 2015, 110 pounds of the chromium-containing dust was shipped off-site.
3. On June 2, 2015, the next and last documented hazardous waste shipment, 7,025 pounds of chromium-containing dust, was shipped off-site.

Since January 17, 2013, Sejong has shipped hazardous waste off-site using a hazardous waste manifest on twelve occasions. Of those, five shipments were comprised of conditionally exempt small quantity generator amounts (from 100 pounds up to 200 pounds), while the remaining seven were either small quantity generator amounts (from 760 pounds up to 1,600 pounds) or large quantity generator amounts (from 2,350 pounds up to 7,025 pounds). Based on these amounts, it appears that Sejong has been at least a small quantity generator for the majority of the last three years.

Sejong was unable to provide documentation demonstrating that it had provided its hazardous waste workers with the required hazardous waste management or emergency response training.

10) Summary

The purpose of this inspection was to determine Sejong’s compliance with the applicable requirements of Alabama’s Hazardous Waste Program regulations. Based on observation made during the CEI, Sejong appears to be an episodic small quantity generator of hazardous waste rather than a conditionally exempt small quantity generator as it had notified in October 24, 2014. Sejong failed to demonstrate that it recognized the increased regulatory requirements that is incumbent upon the facility due to the increased generation of hazardous waste.

The following potential areas of noncompliance were noted at the time of the inspection:

- Sejong could not provide documentation of the quantity of hazardous waste generated each month.
- Sejong shipped more than 2,200 pounds of hazardous waste off-site, at least, twice since July of 2014; the most recent shipment occurred on July 2, 2015.



- Sejong did not notify the Department of its regulated waste activity between October 24, 2014 and March 22, 2016.
- Sejong did not include the EPA hazardous Waste Numbers for all wastes generated at the site on its most recent notification.
- Sejong did not provide all requested/required documentation during the inspection.
- Sejong did not provide hazardous waste management training to its workers that handle hazardous waste.
- Sejong did not mark five containers holding UW lamps and four UW batteries with one of the required phrases.
- Sejong did not keep closed five boxes containing UW lamps.
- Sejong did not have a method in place to document the length of time it accumulated UW at the facility. None of the materials identified as UW were dated and facility representatives were not able to demonstrate any other method used to document how long UW was accumulated at the site.
- Sejong accumulated one box containing fluorescent lamps, dated and labeled as hazardous waste, since September 1, 2015, a total of 203 days.
- Sejong did not remove containers from satellite accumulation areas within three days of the date they became full. Sejong left two filled satellite accumulation containers of chromium-containing dust in place at the UD baghouse from the time that unit was deactivated on December 14, 2015, a total of 99 days at the time of the inspection.
- Sejong did not place an accumulation start date on each satellite accumulation container once the volume exceeded 55 gallons. At each of the five baghouses, there were two drums accumulating waste. In each case, at least 55 gallons of waste was present, yet none of the containers were marked with accumulation start dates.
- Sejong stored hazardous waste in containers that were not in good condition. Four of the drums associated with the baghouses were rusted or had rusted lids.
- Sejong did not mark all satellite accumulation containers holding hazardous waste with the words "Hazardous Waste". One 55-gallon drum holding chromium dust and one 55-gallon drum holding spent paint pens were not marked in any way.
- Sejong did not mark one 55-gallon open-top drum holding oil-saturated sorbents with the words "Used Oil". Instead, it was labeled with the words "Oily Hazardous Waste".

Following the inspection, we met with the facility representatives for a closing meeting. We reviewed our observations and gave them the opportunity to ask questions. At the conclusion of the closing conference, I prepared a *Preliminary Inspection Report* that addressed the areas of potential noncompliance noted during the inspection. We left the top copy of the form and several guidance documents with facility personnel and departed the site at 5:00 p.m.

11) **Signed**

Compliance and Enforcement Section
Industrial Hazardous Waste Branch
Land Division

April 27, 2016
Date



12) Concurrence

A handwritten signature in black ink, reading "Clethes Stallworth", is positioned above a horizontal line.

Clethes Stallworth, Chief
Compliance and Enforcement Section
Industrial Hazardous Waste Branch
Land Division

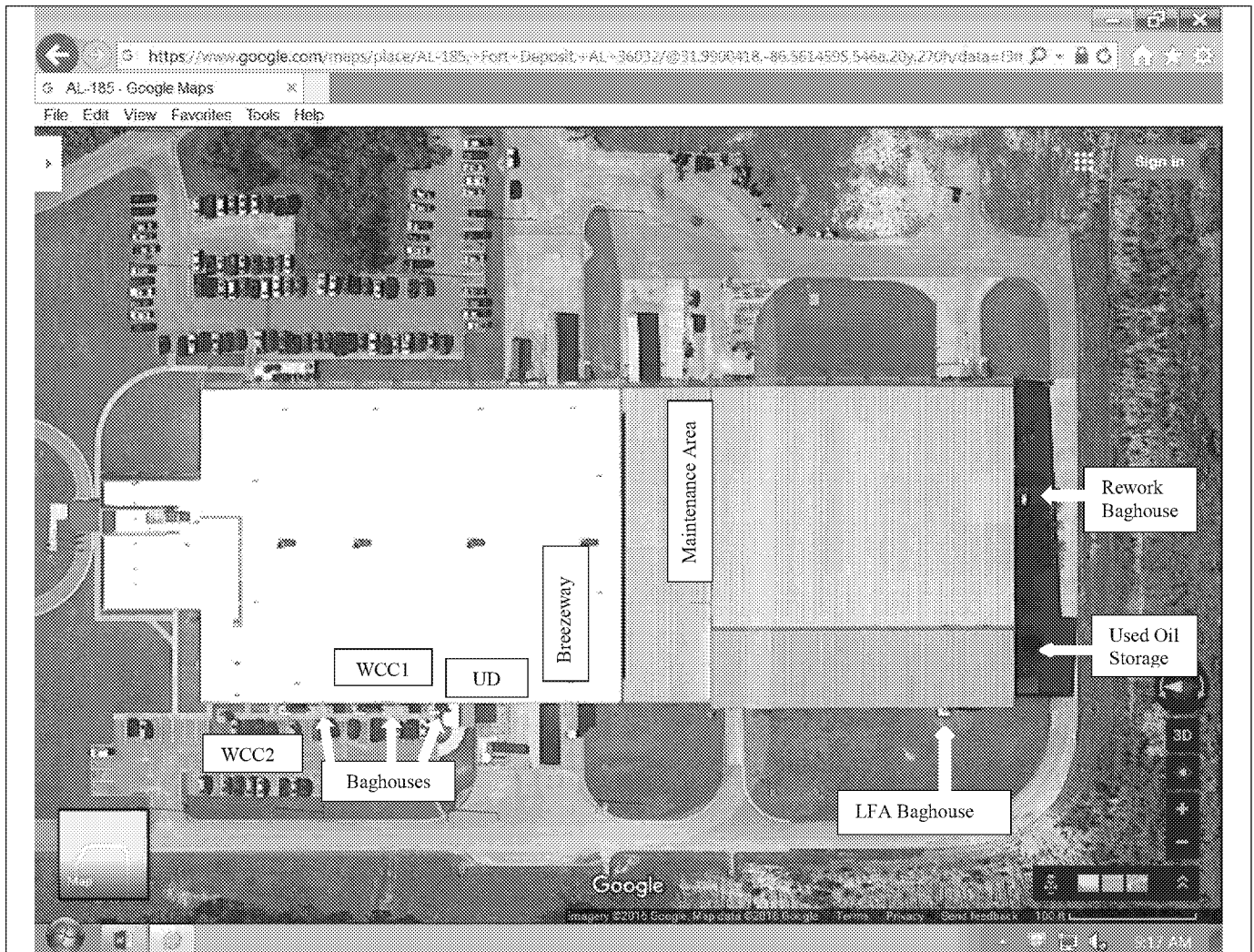
April 27, 2016

Date

Attachment - Photo Log

35454 ALR000058180 085 20160427 HWTM CEI Report

ATTACHMENT – SEJONG ALABAMA LLC PHOTO LOG



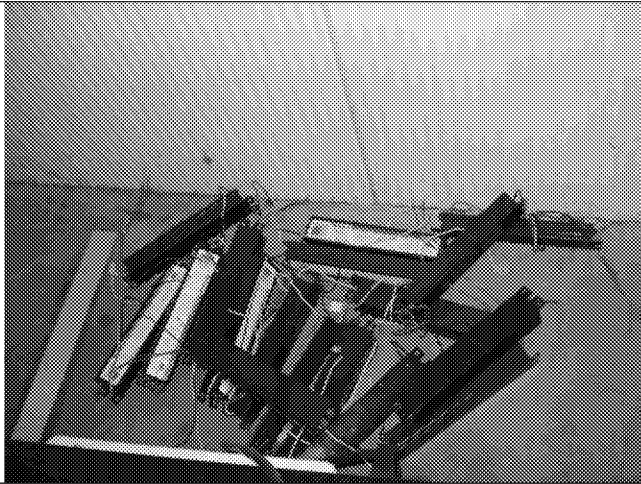
1. Google Maps view of site



2. Universal waste lamps, including one not contained



3. Universal waste lead-acid batteries



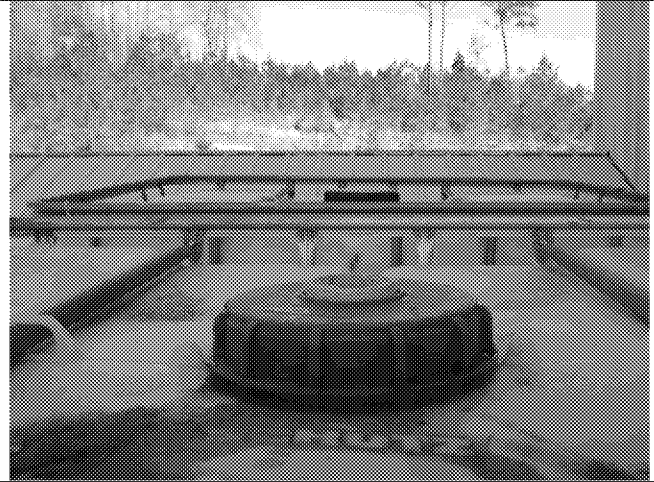
4. Spent electronic ballasts



5. Spent paint pens – D001



6. Used Oil storage area



7. UO totes - closed



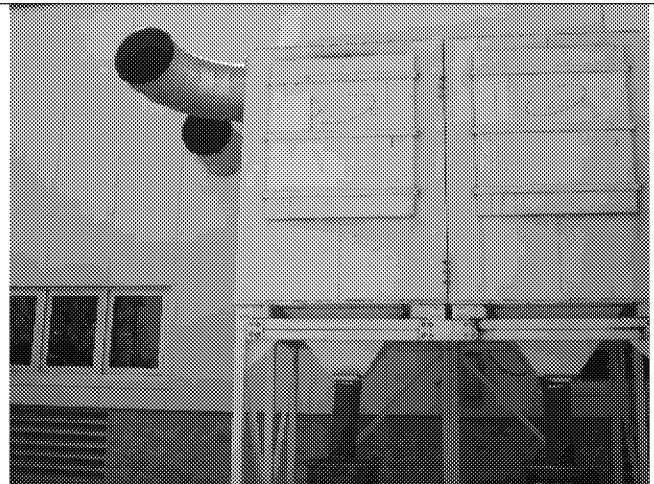
8. LFA Baghouse



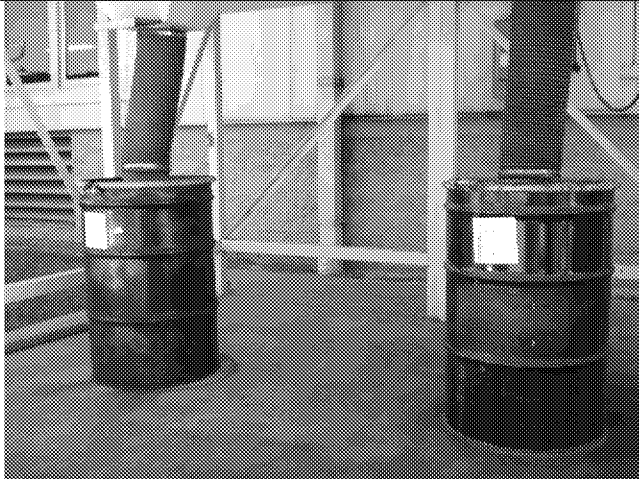
9. UD Baghouse



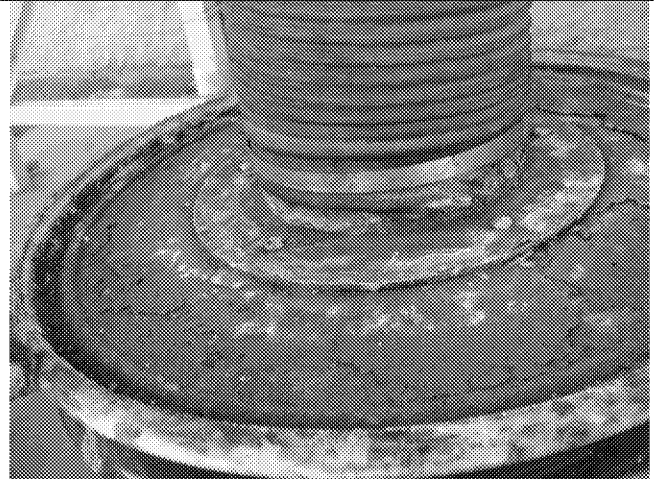
10. UD Baghouse – Rusted drum



11. UD Baghouse – Return air disconnected



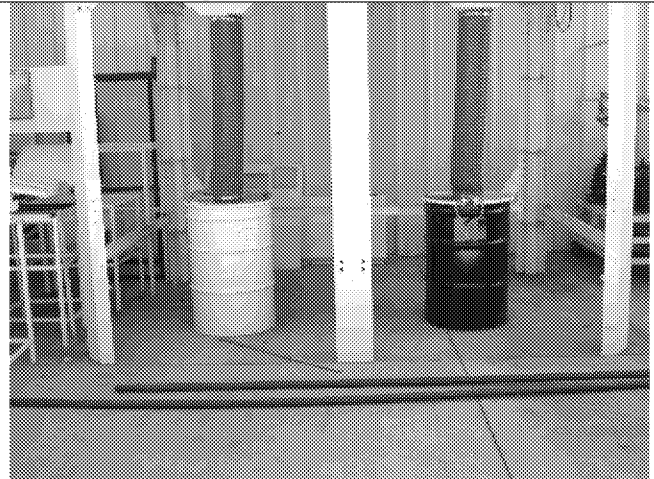
12. WCC1 Baghouse



13. WCC1 Baghouse – rusted baghouse connector



14. WCC2 Baghouse



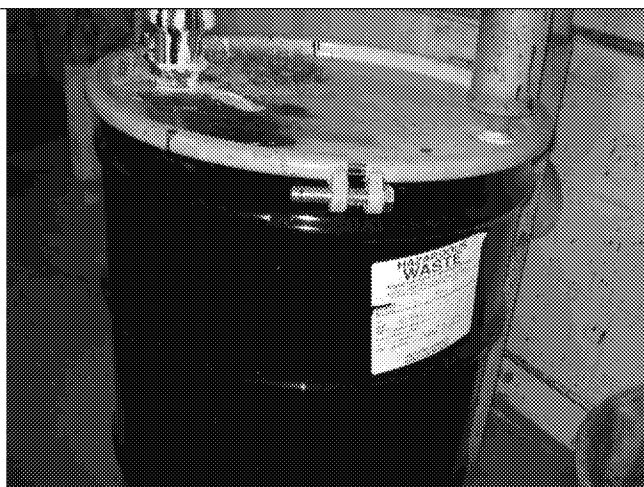
15. Rework Baghouse



16. Maintenance Shop - Universal Waste lamps



17. Mechanical Room/Chemical Storage Area - Aerosol can puncture unit



18. Mechanical Room/Chemical Storage Area - Aerosol puncture unit label



19. Mechanical Room/Chemical Storage Area – Paint cans and spent aerosol cans



20. Mechanical Room/Chemical Storage Area - Oil saturated sorbents